

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JABBAR COLLINS,

DECLARATION OF
GEORGE DIAZ
Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*

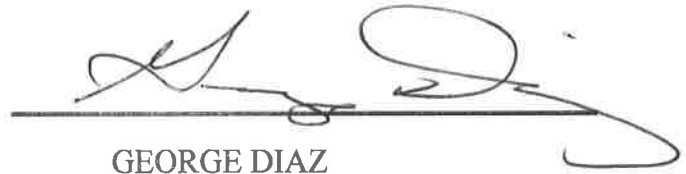
11 Civ. 0766 (FB)(RML)

Defendants.

George Diaz declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am currently employed as Administrative Manager of Technical Services at the Kings County District Attorney's Office. I have held this position since 1990.
2. In my position as Administrative Manager of Technical Services, I receive requests for multimedia support, including for Continuing Legal Education presentations made in the District Attorney's Office by members of its staff. This multimedia support includes providing video and audio recording, as well as setting up equipment for PowerPoint to accompany presentations.
3. Once a request for multimedia support is received, that request is assigned to a member of the staff and entered into my electronic calendar.
4. Attached as Exhibit 1 is a true and correct copy of my electronic calendar for the month of April 2012. The entry for April 4, 2012 reflects an appointment from 2:30 PM to 4:30 PM labeled "Pwr Pt."

5. Attached as Exhibit 2 is a true and correct copy of my electronic calendar entry for an appointment from 2:30 PM to 4:30 PM on Wednesday, April 4, 2012. The subject line contains the words "Pwr Pt," which means that the multimedia support required was a projector for PowerPoint during a presentation. The note section of this calendar entry was made according to my normal practice, in which I identify the person to whom the task is assigned by their initials, the person making the request, and any special instructions. In this case, "VH" reflects that this task was assigned to Vincent Harris, and "ADA Hersh x2149" reflects that ADA Lauren Hersh made the request, along with her contact information. Exhibit B reflects that no request was made for video capabilities.
6. I declare under penalty of perjury that the foregoing is true and correct. Executed in Brooklyn, New York, on May 8, 2014.



GEORGE DIAZ

Exhibit 1

April 2012

April 2012

May 2012

Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Apr 1	2	3	4	5	6	7
		Laptop Distribution an 8:00am 4:00pm GD off AL (Rm. 1601) - DIA 4:00pm 12:00am RN off AL - DIAZ, GEOR 4:00pm 7:00pm Pwr Pt	Hosp Stmt (KCH) - H/ 9:30am 3:00pm C&C - 2:30pm 4:30pm Pwr Pt 4:00pm 6:00pm CLE (B 4:00pm 4:30pm Compe 4:30pm 5:00pm Comp	9:30am CC off AL (Rm. 1601) - DIAZ, GEOR 12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEOR 10:00am 12:00pm Interview with Rache	Proj Safe Surrender (212 Tompkins Ave) - HARRIS, 8:00am 4:00pm GD off AL (Rm. 1601) - DIAZ, GEORGE	
8	9	10	11	12	13	14
8:00am DZoffAL/CP cov (Rm. 1601) - DIA4:00pm 8:00am 4:00pm GD off AL (Rm. 1601) - DIA 9:30am 5:30pm CC off AL (Rm. 1601) - DIA 4:30pm 5:00pm Cancel		Laptop Distribution an 9:00am 12:30pm DVD Proj Cart (Moot Ct Rm - 20 fl) - HARRIS, 4:00pm 12:00am RN off AL - DIAZ, GEOR		12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEORGE	Interview Robert Colle 2:00pm 5:30pm CC off AL (Rm. 1601) - DIAZ, GEORGE 3:00pm 3:30pm Step 1 - Harold Williams (L	RN off AL/CP cov (Rm.
15	16	17	18	19	20	21
	10:30am 11:30am CCT Video Room Walk through. (120 Schemerhorn) - WILLIAMS, HAROLD R	8:00am DZ off AL (Rm. 1601) - DIAZ, GEOR Laptop Distribution an 8:30am 3:00pm Pwr Pt 9:00am 1:00pm Pwr Pt 10:30am 12:00pm Pres 4:00pm 12:00am RN of	9:30am 3:00pm C&C - WILLIAMS, HAROLD R 10:00am 6:00pm HW off AL (Rm. 1610) -	12:00am 8:00am AW off AL/RN cov. (Rm. 1601) - DIAZ, GEOR 4:00pm 5:30pm CLE (BKTR) - HARRIS, VI		
22	23	24	25	26	27	28
8:00am DZ off AL/CP cov (Rm. 1601) - D4:00pm		Laptop Distribution an 8:30am 3:00pm Pwr Pt (Muster Room) - HA 4:00pm 12:00am RN off AL - DIAZ, GEOR 5:00pm 8:30pm Play D	8:00am 3:00pm C&C - WILLIAMS, HAROLD 8:00am 2:00pm Career 1:30pm 5:00pm Pwr Pt 2:00pm 2:30pm Possibl 5:00pm 8:30pm Play D	12:00am 8:00am AW off AL/RN cov. (Rm. 9:00am 12:30pm Pwr Pt (Muster Rm 18 fl) 10:00am 6:00pm HW off AL Our Wedding	8:00am 4:00pm GD off AL (Rm. 1610) - DIAZ, GEORGE 10:00am 6:00pm VH off AL (Rm. 1601) - DIAZ, GEORGE	
29	30	May 1	2	3	4	5

Apr 1 - 7

Apr 8 - 14

Apr 15 - 21

Apr 22 - 28

Apr 29 - May 5

DIAZ, GEORGE

1

4/30/2014 1:06 PM

Exhibit 2

DIAZ, GEORGE

Subject: Pwr Pt
Location: Muster Room

Start: Wed 4/4/2012 2:30 PM
End: Wed 4/4/2012 4:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: HARRIS, VINCENT R
Required Attendees: CHRISTIE, CORNEL; DIAZ, GEORGE; JOHN, CURTIS; NELSON, RONALD J; PARENTE, CHARLES P.; WILLIAMS, HAROLD R; WONG, ALAN; ZEMA, DAVID A

VH

ADA Hersh x 2149